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**Diamond Shamrock**

Certified Mail/Return Receipt Requested

US EPA RECORDS CENTER REGION 5



534144

December 18, 1986

Mr. Dan Bicknell  
CERCLA Enforcement Section (5HE-12)  
U.S. Environmental Protection Agency  
Region V  
230 S. Dearborn Street  
Chicago, Illinois 60604

RECEIVED  
DEC 22 1986  
U.S. EPA REGION V  
HAZARDOUS WASTE ENFORCEMENT DIVISION  
CHICAGO, ILLINOIS 60604

RE: Painesville Chrome Site Schedule

Dear Mr. Bicknell:

The purpose of this letter is to review work accomplished to date and work remaining, with estimated timing. Attached is a small sketch of the site for reference, marked up to show approximate locations of work. The item numbers refer to the items in the approved site maintenance work plan submitted by our own Mel Skaggs August 8, 1986 letter.

1. Bank Stability Markers

Completed: This data, showing no significant bank marker movement, was summarized and submitted with the site maintenance scope of work.

To be done: This item is complete.

2. Bare Spots...

4. Ruts, Erosion Rills

The response to both items is similar, so they are grouped together for convenience.

Completed: The entire site cap was closely inspected, and any of these situations were identified by wooden stakes with color-coded plastic ribbon. Approximately 60% of the cap surface was then covered (see sketch) by crews mainly hand-working limited areas in the immediate vicinity of each stake. The usual procedure was to apply topsoil,



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then seed and fertilizer. Wet weather has been a problem since mid-September, severely limiting even small garden vehicles needed to haul topsoil, seed, and fertilizer. Larger areas, especially west of the main drainage swale, were rototilled with farm equipment and hydroseeded by a commercial lawn care service. This activity has been terminated due to cold weather. Topsoil has been stockpiled onsite to facilitate completing this activity in 1987.

To be done: The remaining 40% of the site cap will be inspected in the vicinity of each stake, and any improvements required will be done as described above. Scheduling is weather dependent, requiring continuous warm, dry weather for small vehicle access and good seed germination. We plan to resume the activity in late spring 1987. The remainder of the cap could be completed in about 10 good working days, depending on the weather. We will notify you prior to renewing site work in 1987.

### **3. Low Spots, Standing Water Areas**

Completed: Suspected low spots were staked as part of the cap inspection discussed above. These low spots, small ruts, animal burrows, etc. were filled and seeded as part of the 60% of the cap stake work completed as described above. General site drainage improvements in the West and Main Drainage Swale contours were completed, and these areas were seeded.

To be done: Due to wet weather, the Main Drainage swale was seeded so late in the year (early November) that germination before spring 1987 is unlikely. Mats will be applied after the swale dries or freezes in December, 1986 or January, 1987 to provide temporary erosion protection. Additional drainage swale improvements are planned inside the dike



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along the north and south sides of the cap, also. This will be done in summer, 1987, during dry weather. Small low spots will be filled and seeded as part of the remaining site cap stake work described above, resuming late spring, 1987 (see item Nos. 2 and 4), depending on the weather.

### **5. Animal Excavations**

Completed: All animal burrows were identified and staked as part of the intense site inspection described above (item Nos. 2 and 4). These were smoke bombed to eliminate the animals, and the burrows were filled.

To be done: The area around all burrows in the eastern 40% of the site will be graded and seeded as part of the remaining stake work scheduled for late spring, 1987, depending on the weather.

### **6. Yellow Green Discolored Soil**

Completed: A notification of Hazardous Waste Activity form was submitted to U.S. EPA by letter dated October 10, 1986. We understand the form is being processed, reference your log No. 87-993.

To be done: Once a generator number is received, recurrent stain areas in the flat area west of the pipe bridge will be marked, excavated, properly disposed, and the hole backfilled. We could complete this process during late spring dry weather, or during a frozen period in January/February, depending on the generator number status and the weather. Onsite time is expected to be less than five good working days.



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### 7. Active Leachate Seeps

Completed: See item No. 6 for the status of the notification of Hazardous Waste Activity form.

To be done: This area will be marked, excavated, and properly disposed with the material from item No. 6, with that estimated scheduling. The hole will be backfilled and new rip-rap emplaced immediately following excavation.

### 8. Fence Damage

### 9. Bank Erosion

These two items are grouped together for convenience in responding.

Completed: The north and east side property fences have been inspected, and required repairs have been completed. About 50 feet of fence on the south end of the east fence were removed to permit access east to the riverbank for erosion control project installation purposes. A riverbank erosion control installation was designed, and a Corps of Engineers permit application is being prepared. Large, clean chunks of concrete rubble averaging about one ton each have been stockpiled in preparation for installation, as has geotech (soil retention) fabric. A riverbank access road was completed from the pre-existing road end turn-around to the vicinity of monitoring well No. 10 to facilitate erosion control project installation.

To be done: Once the Corps of Engineers permit is received, the project can be installed. Summer 1987 low water, around August, would technically be the best time. The installation is expected to take a maximum of three weeks onsite. Once the east end of the project is installed past the fenceline, the southernmost 50 feet of fence can be re-installed. The fence work should take less than 3 days onsite.



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In addition, we will begin a program of site cap mowing and fertilization in 1987. Originally, the site was seeded with appropriate erosion control vegetation. Vigorous growth resulted, especially in the first-seeded eastern area of the cap. This accomplished the purpose and also limited vandal access. We think that site inspections will be facilitated by mowing, and that site maintenance can therefore be improved. We will evaluate this program at the end of 1987, and determine if it should be continued.

If you have any questions, please call me at this new number: (216) 779-3235. My new address is on the letterhead.

Sincerely,

DIAMOND SHAMROCK CORPORATION

P. J. Dugas  
Sr. Environmental Engineer

cc: Mr. Kevin Bonzo, Ohio EPA, Twinsburg, Ohio

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